

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

RED BARN MOTORS, INC,
DONALD B. RICHARDSON, AND
BARBARA A. RICHARDSON

CIVIL ACTION NO. 13-00778

VERSUS

JUDGE BRIAN A. JACKSON

NEXTGEAR CAPITAL, INC,
as successor-in-interest to DEALER
SERVICES CORPORATION, and
LOUISIANA'S FIRST CHOICE AUTO
AUCTION, L.L.C.

MAG. RICHARD L. BOURGEOIS, JR.

**LOUISIANA'S FIRST CHOICE AUTO AUCTION, L.L.C.'S
MOTION FOR LEAVE TO FILE REPLY MEMORANDUM
TO PLAINTIFFS' OPPOSITION TO MOTION TO DISMISS**

Louisiana's First Choice Auto Auction, L.L.C. ("First Choice"), appearing herein through undersigned counsel, hereby moves for leave to file a reply to Plaintiffs' Memorandum in Opposition to Motion to Dismiss ("Opposition").

After reviewing the Opposition, First Choice believes a reply memorandum is necessary. In order to address a number of issues raised by Plaintiffs in their Opposition (R.Doc 16).

Therefore, First Choice respectfully requests that the Court grant their leave to file Reply with respect to the arguments raised by Plaintiffs in its Opposition.

Respectfully Submitted:

/s/ Lisa Brener
Lisa Brener, La. Bar #01809

Chelsea Cusimano, La. Bar #34857
Brener Law Firm, LLC
3640 Magazine Street
New Orleans, LA 70115
Telephone: (504) 302-7802
Facsimile: (504)304-4759
lbrener@brenerlawfirm.com

Attorneys for Louisiana's First Choice Auto Auction

CERTIFICATE OF SERVICE

I hereby certify that on 11th day of March a copy of the foregoing Motion for Leave to File Reply Memorandum of Louisiana's First Choice to Plaintiffs' Opposition to Motion to Dismiss was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

Cassie E. Felder
Cassie Felder & Associates, L.L.C.
263 3rd Street, Suite 308
Baton Rouge, LA 70801

Robin B. Cheatham
Adams & Reese, LLP
701 Poydras Street, Suite 4500
New Orleans, LA 70139

/s/Lisa Brener
Lisa Brener